

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:	§	Case No. 13-33404
	§	
GARY GRIFFITH	§	
	§	
	§	
Debtors	§	Chapter 7

**MOTION TO EXTEND THE TIME TO FILE SCHEDULES, STATEMENT OF
FINANCIAL AFFAIRS, MEANS TEST, EMPLOYEE INCOME RECORDS AND
MATRIX COVER SHEET**

TO THE HONORABLE JUDGE HARLIN DEWAYNE HALE:

NOW COMES Gary Griffith, (the "Debtor's"), by counsel, hereby moves this court for entry of an order under Ule 1007 (a) and (c) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), extending the deadline by which the Debtor must file his schedules of assets and liabilities (the "Schedules"), Statement of Financial Affairs (the "SOFA"), Means Test, Employee Income Records and Matrix Cover Sheet by 30 days.:

JURISDICTION AND VENUE

1. This court has jurisdiction over this Motion pursuant to 28 U.S.C. § § 157 and 1334. This Motion is a core proceeding pursuant to 28 U.S.C § 157(b). Venue of this case and this Motion in this district is proper under 28 U.S.C. 1408 and 1409. The legal predicates for the relief requested herein are Bankruptcy Rule 1007 (a) and (c).

BACKGROUND

1. On July 2nd, 2013, Gary Griffith (the "Debtor") files his voluntary petition in this Court for relief under the above-captioned Chapter 7 bankruptcy [ECF No. 1].
2. Trustee appointed in this Chapter 7 case is Diane G. Reed.

RELIEF REQUESTED

3. By this Motion, the Debtor requests that the Court enter an Order extending the deadline to file his Schedules, Statement of Financial Affairs, Means Test, Employee Income Records and Matrix Cover Sheet from 07/15/2013 through and including 08/15/2013.

APPLICABLE AUTHORITY

4. Under Bankruptcy Rule 1007 ©, the Debtor may obtain a further extension of the Schedules, Statement of Financial Affairs, Means test, Employee Income Records, and Matrix Cover Sheet deadline for “cause” shown.

5. Debtor incurred severe hardship when he was diagnosed a couple of years ago with cancer. It caused Debtor to become delinquent in his debt payments.

Debtor submits that “cause” exists to extend the Schedules, Statement of Financial Affairs, Means Test, Employee Income Records, and Matrix Cover Sheet deadline by 30 days or more. The requested extension will enhance the accuracy of the Debtor’s Schedules, SOFA, Means Test, Employee Income Records, and Matrix Cover Sheet and avoid the necessity of subsequent amendments.

NO PRIOR REQUEST

6. No previous request for the relief sought herein has been made to this Court or other courts.

CONCLUSION

WHEREFORE, the Debtor respectfully request that the Court enter an Order Granting the relief request in the Motion and such other and further relief as may be just and proper.

Respectfully submitted,

NNK Legal Group, LLC

By: /s/ William P. Kennedy

William P. Kennedy

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Attorney for Debtor

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 15th day of July 2013 a copy of the foregoing *Motion to Extend The Time to File Schedules, SOFA, Means Test, Employee Income Records, and Matrix Cover Sheet* was served by U.S. first class mail on the following and all parties in interest on the mailing matrix as filed with the court:

Mr. Gary Griffith
4694 FM 2869
Winnsboro, TX 75494

Diane G. Reed
501 N. College Street
Waxahachie, TX 75165

Office of the U.S. Trustee
1100 Commerce Street
Room 1254
Dallas, TX 75242-1496

/s/ William P. Kennedy
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